

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13  
: :  
Wanda I. Moreno : No. 18-15741-AMC  
Debtor :

ANSWER TO MOTION OF BAYVIEW LOAN SERVICING, LLC.  
FOR RELIEF FROM THE AUTOMATIC STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted in part, Denied in part. Admitted that some payments have been missed as a result of the debtor being out of work for a period of time. Debtor will supply accounting to reflect proof of all payments made and asks for the chance to catch up the remaining arrears.
7. Debtor is unsure of the same.
8. Denied cause exists as some payments were made.
9. No response required.

WHEREFORE Debtor respectfully requests this Honorable Court deny Movant's Motion for Relief.

/s/ David M. Offen  
David M. Offen  
Attorney for Debtor(s)

Dated: 12/18/19

CERTIFICATE OF SERVICE

The following has been served by electronic mail:

Rebecca Solarz on behalf of Bayview Loan Servicing, LLC.  
[bkgroup@kmlawgroup.com](mailto:bkgroup@kmlawgroup.com)

/s/ David M. Offen  
David M. Offen  
Attorney for Debtor

Dated: 12/18/19